

Accepted

Minutes from the Individual Sewage Disposal System (ISDS) Task Force – Regulatory Working Group Meeting of September 25, 2001

The meeting was held in Conference Room 280, DEM Office of Water Resources, 235 Promenade Street and began at approximately 8:10 a.m.

In attendance:

Russ Chateaufneuf, Eugenia Marks, Alison Walsh, Joe Frisella, Tom D'Angelo, Scott Moorehead, Tom Getz, Ernie Panciera, Deb Knauss

It was noted that the October 18th public hearing on the fee rule change has been cancelled.

Review of Minutes from September 11, 2001

Accepted as presented.

Variances

Russ stated that in an effort to respond to the loss of a staff person who was reviewing variances, a couple of RIPDES personnel, are reviewing ISDS applications, so that more time is available for ISDS staff responsible for reviewing variances to do so. The RIPDES staff persons providing this assistance have prior experience reviewing ISDS applications.

The variance application form is going to be revised to clearly state what information must be submitted and that the designer must make the case for how the proposed system will be as effective in protecting public health and the environment as one which meets code. This is anticipated to reduce the number of times that variance applications are returned to designers. The form will also be modified with inclusion of an advisory stating that variance applications take longer to process, than applications for systems which meet code, due to review and the notice to abutters; information on possible review time will be provided.

The Department plans to schedule a series of meetings with designers to discuss the variance application process. Case studies would be presented, to explain what solutions were applied and why they were appropriate for the conditions at each of the sites. Modifications to the variance application form would be discussed. Designers would be urged to respond to DEM promptly when applications are returned.

The Department is considering keeping two work-lists of variance applications: those, which have been returned to designers with comments, would receive a shorter review period upon re-submission, than new applications. However, in some cases it may be necessary to deny a poorly prepared, poorly documented application rather than work toward a solution.

There was discussion of changing the rule to allow a project-redesign, which does not change the variances applied for, to not require submitting a new variance application. There was also discussion of considering shortening the Department's one-year re-submission deadline.

It was suggested that the Department consider developing a list of licensees who have proved themselves to not require oversight, conduct only spot-checks of these peoples' work and utilize the inspectors' field-time savings for the review of applications. It was also suggested that the Department provide quicker review for designers who submit higher quality work.

Russ presented some statistics, which report that fewer inspections have been conducted in 2001 than in 1999. The data also show that there were fewer *re*-inspections conducted in 2001 than prior to implementation of the licensing program (October 1, 1999). There have been fewer re-inspections of "licensed projects" than for "un-licensed projects".

Leachfield Construction

Figure Y – A retaining wall option should be added to the language and the figure. A note should be added to clarify that a retaining wall is not a decorative landscape wall.

Stripping native soil to the C horizon and backfilling with gravel, was objected to, as it fails to utilize the treatment potential of the native soil. Department staff recommended this due to concern about compaction of the soil by equipment during construction. It was suggested that such compaction is no more likely for systems in which the bottom is above original grade, such as presented by Figure Y, than for systems where the bottom of stone is below original grade, as in Figure X.

It was suggested that the rules limit construction of systems with bottom of stone above grade, to track-mounted equipment. It was also suggested that construction requirements, for systems where the bottom of the stone is above grade, could be a function of site-specific soil conditions, for example, in outwash allow the B horizon to remain; in dense till require that the B horizon be removed. It was also suggested that if the construction technique required can not be executed for a conventional system, that the designer must use another technology.

It was suggested that the specifications for ISDS gravel be tightened-up, or that a 6-inch layer of filter sand or concrete sand be delivered beneath the gravel.

Language from the Bottomless Sandfilter Guidance Document, requiring that the area of the leachfield be marked and protected prior to site preparation activities, will be added to the draft language in the ISDS rules.

Adjournment

The meeting adjourned at approximately 10:15.

Next Meetings

Tuesday, October 9, 2001 – 8:00 a.m. to 10:00 a.m.

Conference Room 280, DEM Office of Water Resources, 235 Promenade Street